EXHIBIT L

Snell & Wilmer
—— L.L.P ——
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August 15, 2012

VIA ELECTRONIC MAIL AND U.S. MAIL

Anthony R. Pecora
Dennis M. O'Toole
Matthew A. Dooley
Stumphauzer OToole McLaughlin
McGlamery & Loughman Company
5455 Detroit Rd.
Sheffield Village, OH 44054

Re: *Daniel, et al. v. Swift Transportation*

Dear Counsel:

By this letter, we wish to remind Plaintiffs of their obligation, under Fed. R. Civ. P. 26(e), to supplement their discovery responses in a timely manner.

During Ms. Hodges' and Mr. Daniel's depositions, they each confirmed a number of inaccuracies in their responses as related to their job history (Interrogatory No. 11) and their criminal history (Interrogatory No. 3). Nevertheless, those responses remain their sworn, verified responses in this matter despite their obligation to supplement the information "if the party learns that in some material respect the disclosure or response is incomplete or incorrect."

To be clear, as discussed at Mr. Daniel's deposition, we are requesting that he identify his actual employers for the relevant time period, not a company that he was contracted to through another employer (*e.g.*, Mr. Daniel testified that he was never employed by DHL/Airborne Express, but that he always worked for a company that contracted with DHL/Airborne Express). We further understand that Mr. Daniel has subsequent job history (*i.e.*, his employment with CR England has ended and he has a new employer) and has failed to supplement this response with this new information. At Mr. Daniel's deposition more than 2 months ago, Mr. Daniel and Mr. O'Toole agreed that they would provide supplemental information updating this job history.

We note that Plaintiffs indicated that they would supplement their responses to Request for Production No. 1. Please provide any responsive documentation to that Request in Plaintiffs'

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possession at this time.   Mr. Daniel also indicated that he would supplement his response to Request for Production No. 7.

Please review Plaintiffs' responses to Swift's First Set of Non-Uniform Interrogatories, as well as Swift's Requests for Production, and let us know if either Ms. Hodges or Mr. Daniel wishes to supplement or revise any of his or her responses and provide any additional documentation.   We request any supplemented responses and/or documentation on or before August 29.

Very truly yours,

Snell & Wilmer L.L.P.

Joseph A. Kroeger /mes

Joseph A. Kroeger

cc: Leonard Bennett (via e-mail)
      Stanley Lubin (via e-mail)

JAK:el

Kroeger, Joe

From:	Kroeger, Joe
Sent:	Tuesday, September 11, 2012 8:04 AM
To:	'Leonard Bennett'; mdooley@sheffieldlaw.com; dotoole@sheffieldlaw.com; Audrey Tedor; apecora@sheffieldlaw.com; Susan Rotkis
Cc:	Lomax, John; Foster, Brian
Subject:	FW: Activity in Case 2:11-cv-01548-ROS Daniel et al v. Swift Transportation Corporation Notice (Other)

Counsel,

As a second reminder (the first was sent in an e-mail on September 3), Plaintiffs have functionally failed to serve any supplemental interrogatory responses due to their failure to verify their interrogatory responses. Under FRCP 26(g)(2) and 33(b)(5), it is the equivalent of Plaintiffs not having supplemented their interrogatory responses at all.

Thanks,

Joe

From: azddb_responses@azd.uscourts.gov [mailto:azddb_responses@azd.uscourts.gov]
Sent: Tuesday, September 11, 2012 7:29 AM
To: azddb_nefs@azd.uscourts.gov
Subject: Activity in Case 2:11-cv-01548-ROS Daniel et al v. Swift Transportation Corporation Notice (Other)

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U.S. District Court

DISTRICT OF ARIZONA

Notice of Electronic Filing

The following transaction was entered by Dooley, Matthew on 9/11/2012 at 7:29 AM MST and filed on 9/11/2012

Case Name:	Daniel et al v. Swift Transportation Corporation
Case Number:	2:11-cv-01548-ROS
Filer:	Kelvin D Daniel
	Tanna Hodges

Document Number: 80

1

Docket Text:
NOTICE re Service of Supplemental Answers to Interrogatories and Supplemental Responses to Request for Production by Kelvin D Daniel, Tanna Hodges . (Dooley, Matthew)

2:11-cv-01548-ROS Notice has been electronically mailed to:

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Brian J Foster   bfoster@swlaw.com, bkinningham@swlaw.com, docket@swlaw.com

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] [542734a987689c0fd440c85bca6b58508daa983992e0a164784c6878d904b466c3f
aeeec9741ecd9384da1d3d06d94328e5c0cdebef0bfbf7df829af4d9acf89]]